

DORSEY & WHITNEY LLP
Laura M. Lestrade
51 W. 52nd St.
New York, NY 10019-6119
Telephone: (212) 415-9227
Fax: (212) 953-7201
Email: lestrade.laura@dorsey.com
Attorney for Defendant Mike Dai

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually)	
and on behalf of all others similarly)	Civil Action No.: 18-2293
situated,)	(FLW)(ZNQ)
)	
Plaintiff,)	Hon. Zahid N. Quraishi
)	
v.)	CERTIFICATION OF THOMAS
)	O. GORMAN, ESQ. TO APPEAR
RIOT BLOCKCHAIN, INC. f/k/a)	<i>PRO HAC VICE</i>
BIOPTIX, INC., JOHN O'ROURKE,)	
JEFFREY MCGONEGAL, BARRY)	
HONIG, CATHERINE)	
DEFRANCESCO, MICHAEL)	
BEEGHLEY, JOHN STETSON,)	
MARK GROUSSMAN, ANDREW)	
KAPLAN, MIKE DAI, JASON LES)	
and ERIC SO,)	
)	
Defendants.)	

Thomas O. Gorman, of full age, certifies as follows:

1. I am an attorney at law and a partner with the law firm of Dorsey & Whitney LLP, practicing at the firm's Washington, DC office located at 1401 New

York Avenue NW, Suite 900, Washington, DC 20006. I submit this certification in support of the motion for my admission to this Court *pro hac vice* for the purpose of representing defendant Mike Dai (“Defendant”).

2. I am associated with New Jersey counsel of record, Laura Lestrade, who is an attorney with Dorsey & Whitney LLP, a member of the bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey. In accordance with Local Civil Rule 101.1(c), Ms. Lestrade will be an attorney of record for Defendant herein with whom the Court and opposing counsel may readily communicate regarding the conduct of this case and upon whom pleadings and other papers may be served.

3. I am a member in good standing of the bars of the states of Ohio, Washington, DC, and New York. I was admitted to the bar of the State of Ohio in 1973, the bar of Washington DC in 1986, and the bar of the State of New York in 1990.

4. I have never been convicted of a crime, censured, suspended, disciplined, or disbarred by any court and there are no disciplinary proceedings pending against me in any jurisdiction.

5. The records of my New York bar membership and good standing can be found from the Attorney Records Clerk, Appellate Division, Third Department,

Robert Abrams Building for Law and Justice, State Street, Room 511, Albany, NY 12223.

6. The records of my District of Columbia bar membership and good standing can be found at 901 4th Street, NW, Washington, DC 20001.

7. The records of my Ohio bar membership and good standing can be found at Office of Attorney Services, 65 South Front Street, Columbus, OH 43215-3431.

8. The records of my membership and good standing to practice before the United States District Court for the Southern District of New York can be found at the Attorney Services office of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007.

9. The records of my membership and good standing to practice before the United States District Court for the Northern District of Ohio can be found at the Attorney Admissions Department, United States District Court, Northern District of Ohio, Carl B. Stokes United States Court House 801 West Superior Avenue Cleveland, Ohio 44113-1830.

10. The records of my membership and good standing to practice before the United States District Court for the Southern District of Ohio can be found at the Clerk's Office for the United States District Court for the Southern District of Ohio, 85 Marconi Blvd., Room 121, Columbus, Ohio 43215.

11. The records of my membership and good standing to practice before the United States District Court for the District of Columbia can be found from the Clerk of the U.S. District Court, United States District Court for the District of Columbia, 333 Constitution Avenue, NW, Washington, DC 20001.

12. The records of my United States District Court for the District of Colorado bar membership and good standing can be found at the Office of the Clerk, United States District Court for the District of Colorado, 901 19th St., Room A105, Denver, CO 80294-3589.

13. The records of my membership and good standing to practice before the Sixth Circuit can be found at the Clerk's Office, United States Court of Appeals for the Sixth Circuit 540 Potter Stewart U.S. Courthouse 100 E. Fifth Street Cincinnati, Ohio 45202-3988

14. Defendant has requested my representation in the above captioned action in this District and has retained me to advise and represent him in this matter, which involves *inter alia* claims governed by Sections 10(b) and 20(a) of the Exchange Act, and Rule 10b-5 promulgated thereunder.

15. There is good cause for my admission *pro hac vice* in that I have substantial experience in handling cases with claims similar to the ones asserted in the instant case. I also have developed substantial factual and legal knowledge of the issues involved in this matter.

16. If this application is granted, I will comply with the requirements of New Jersey Court Rule 1:28-2 and pay the appropriate fee to the New Jersey Lawyers' Fund for Client Protection for each calendar year of my *pro hac vice* admission in this action. I will also comply with the requirements of Local Civil Rule 101.1(c)(3) and pay the appropriate fee to the Clerk of the United States District Court for the District of New Jersey for my *pro hac vice* admission in this action.

17. If this application is granted, I understand and acknowledge that I will be within the disciplinary jurisdiction of this Court and will comply with all the requirements of the rules of this Court, including, but not limited to, the rules requiring New Jersey counsel of record to sign and file all papers, enter appearances for parties, and sign stipulations.

18. I certify that the foregoing is true and correct.

Dated: August 23, 2019,

By: /s/ Thomas O. Gorman
Thomas O. Gorman